

CORRECTED

EXHIBIT G

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CRYSTAL PERRY,

Plaintiff,

Case No. 1:23-cv-00202

v.

Hon. Robert J. Jonker
Mag. Phillip J. Green

MICHIGAN STATE UNIVERSITY;
MICHIGAN STATE UNIVERSITY BOARD OF
TRUSTEES; MARLON LYNCH, and DARYL
GREEN, in their official and individual capacities,

Defendants.

AFFIDAVIT OF KRISTIE SOVA

1. I am an adult and otherwise competent to testify to the facts stated below from my personal knowledge and business records available to me in my professional capacity.

2. I am a Senior Human Resources Professional/S in Human Resources at Michigan State University (MSU).

3. On June 20, 2022, Perry applied for posting 789026, a Human Resources Administrator / Unit Human Resources Administrator II position in the College of Nursing at MSU. (Exhibit C, 789026 - Posting History C.P.)

4. When someone does not successfully complete their probationary period and is terminated, Employee Relations determines whether they can be hired for future positions at MSU and informs Human Resources.

5. Employee Relations determined that Perry could not be hired for future employment at MSU, which Andrew Jarvis (formerly of MSU Human Resources/Employee Relations) communicated to me and Queen McMiller (another MSU Human Resources employee) by telephone on July 12, 2022. We did not discuss Plaintiff's OIE and/or EEOC complaints. Later

that day, I manually changed Perry's status in PageUp for posting 789026, as well as eight other positions she applied for, to "Does not meet basic qualifications – restricted list." (Exhibit C.)

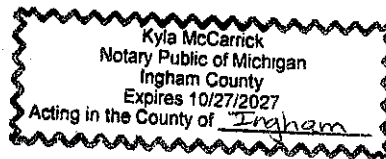
6. I did not change Perry's status for posting 789026 (or the other eight positions she had applied for) because of her OIE and/or EEOC complaints, nor because of any other complaints Plaintiff made about her employment at MSU. In fact, I was not aware of any complaints Perry made regarding her employment at MSU at that time.

Date: May 10, 2023


KRISTIE SOVA

Subscribed and sworn to before me this
10 day of May, 2023

Kyla McCarrick, Notary Public
Ingham County,
My Commission Expires: 10/27/2027



Crystal Perry

[View profile](#) [Add](#)

Applications

History

Scheduled emails

CRM

Resume

Job

Human Resources Administrator / Unit Human Resources Administrator II

Item

All

Tuesday, Jul 12, 2022, 12:06pm

Kristle Sova

Communication

Human Resources Administrator / Unit Human Resources Administrator II (789026)

E-mail: Your Recent MSU Job Application (Posting #789026), To: PERRYCa@msu.edu, From: MSU Careers-No.Reply.Careers@hr.msu.edu>

View

Tuesday, Jul 12, 2022, 12:06pm

Kristle Sova

Note

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Status changed to 'Does not meet basic qualifications - restricted list' by Kristle Sova.
(HR ONLY) Does not meet basic qualifications as determined by MSU HR

Edit Delete

Tuesday, Jul 12, 2022, 12:00am

Kristle Sova

Unsuitable - not suitable for employment

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Unsuitable - not suitable for employment

Edit Delete

Thursday, Jun 23, 2022, 12:02pm

Debra Mansel

Communication

Human Resources Administrator / Unit Human Resources Administrator II (789026)

E-mail: Applications for review - Human Resources Administrator / Unit Human Resources Administrator II - 789026, To: Debra Mansel, mansel@msu.edu, From: noreply@pageuppeople.com

View

Thursday, Jun 23, 2022, 11:32am

Communication

Human Resources Administrator / Unit Human Resources Administrator II (789026)

E-mail: Your Recent MSU Job Application (Posting #789026), To: PERRYCa@msu.edu, From: MSU Careers-No.Reply.Careers@hr.msu.edu>

View

Thursday, Jun 23, 2022, 11:31am

Kyia McCarrick

Note

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Status changed to 'Meets Basic Qualifications - referred to department' by Kyia McCarrick (bulk move).

Thursday, Jun 23, 2022, 12:00am

Kyia McCarrick

Initial up front screening

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Initial up front screening

Tuesday, Jun 21, 2022, 2:04am

Note

Human Resources Administrator / Unit Human Resources Administrator II (789026)

System changed status to 'HR Reviewing - CBA - no bid rights'

Tuesday, Jun 21, 2022, 12:00am

Assessment 1

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Assessment 1

Monday, Jun 20, 2022, 9:18am

Communication

Human Resources Administrator / Unit Human Resources Administrator II (789026)

E-mail: Application received (Posting #789026), To: PERRYCa@msu.edu, From: No.Reply.Careers@hr.msu.edu

View

Monday, Jun 20, 2022, 9:18am

Note

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Application submitted

Monday, Jun 20, 2022, 9:18am

Kristle Sova

Application submitted

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Applied via: External Careers@MSU, Source: MSU Website - HR Website (hr.msu.edu), Score: 0.00, Reason: (HR ONLY) Does not meet basic qualifications as determined by MSU HR

View View applied form rule snapshot Edit

Close

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Crystal Perry

[View profile](#) [Add](#)

Actions

Tuesday, Jun 21, 2022, 12:00am

✓

Assessment 1

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Assessment 1

Monday, Jun 20, 2022, 9:18am

✉

Communication

Human Resources Administrator / Unit Human Resources Administrator II (789026)

E-mail: Application received (Posting #789026). To: PERRY@msu.edu. From: No.Reply.Careers@hr.msu.edu

[View](#)

Monday, Jun 20, 2022, 9:18am

📄

Note

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Application submitted

Monday, Jun 20, 2022, 9:18am

📄

Application submitted

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Applied via: External Careers@MSU. Source: MSU Website - HR Website (hr.msu.edu). Score: 0.00, Reason: (HR ONLY) Does not meet basic qualifications as determined by MSU HR

[View](#) [View applied form rule snapshot](#) [Edit](#)

Monday, Jun 20, 2022, 9:18am

✓

New application

Human Resources Administrator / Unit Human Resources Administrator II (789026)

New application

Monday, Jun 20, 2022, 9:15am

📄

Document

Human Resources Administrator / Unit Human Resources Administrator II (789026)

Cover letter: Cover Letter-Human Resources Administrator-Unit HR Administrator II #789026.pdf Size: 82kb

[View](#) [PDF](#)

There are no more items to show.

Close

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